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United States Attorney

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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

| | | |
|---------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA, |) | Case No. 24-cr-0392 HSG |
| v. |) | UNITED STATES' APPLICATION TO |
| VERONICA JUAREZ, ET AL., |) | UNSEAL DOCKET AND ORDER |
| Defendants. |) | |

The United States of America, through undersigned counsel, respectfully moves this Court to unseal the docket in the above-captioned matter. Defendants Veronica Juarez and Hernando Felix have been arrested and have appeared in open court. Therefore, it is no longer necessary for documents relating to Juarez and Felix to be sealed.

One defendant in this matter remains at large. The United States respectfully requests that the remaining defendant's identity remain under seal because the remaining defendant may flee from apprehension or obstruct this ongoing investigation should the defendant's identity be revealed. Thus, the government respectfully requests that the unredacted indictment remain under seal and that a redacted indictment, attached hereto as Exhibit A, be filed on the docket.

Any future documents relating to the remaining defendant will be filed under seal on the

FILED

Jul 25 2024

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

1 otherwise unsealed docket until that defendant is apprehended.

2
3 DATED: July 25, 2024

Respectfully submitted,

4 ISMAIL J. RAMSEY
5 United States Attorney

6 /s/ Kevin Yeh
7 MAYA KARWANDE
8 KEVIN YEH
9 Assistant United States Attorneys

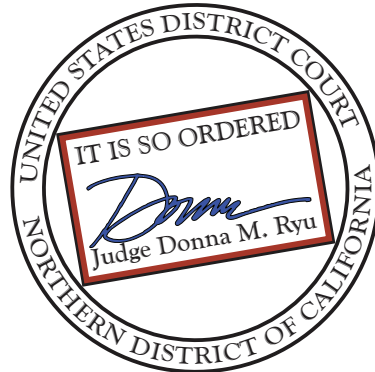
ORDER

Based on the United States' motion, and good cause appearing, the Court ORDERS that the docket in the above-captioned matter be unsealed.

Because one defendant remains at large, the unredacted indictment shall remain under seal and a redacted indictment, attached to the United States' application as Exhibit A, shall be filed on the docket.

IT IS SO ORDERED.

DATED: July 25, 2024



HON. DONNA M. RYU
United States Magistrate Judge

EXHIBIT 1

UNITED STATES DISTRICT COURT

**SEALED BY ORDER
OF THE COURT**

NORTHERN DISTRICT OF CALIFORNIA

FILED

JUL 11 2024

OAKLAND DIVISION

THE UNITED STATES OF AMERICA

VS

VERONICA JUAREZ,

HERNANDO FELIX, and

CR - 24 00392 HSG

**CLERK U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE**

INDICTMENT

**COUNT ONE: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C) –
Conspiracy to Distribute and Possess with Intent to Distribute 50
grams or more of Methamphetamine (Juarez and Felix)**

**COUNT TWO: 21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) –
Distribution of Methamphetamine (Juarez)**

**COUNT THREE: 21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) –
Distribution of Methamphetamine (Felix and [REDACTED])**

**COUNT FOUR: 21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) –
Possession with Intent to Distribute Methamphetamine (Juarez)**

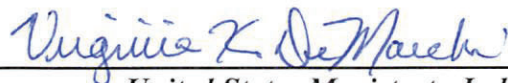
**COUNT FIVE: 21 U.S.C. § 841(a)(1) and (b)(1)(B)(ii) – Possession
with Intent to Distribute Cocaine ([REDACTED])**

A true bill.



Foreperson

Filed in open court this 11 *day of* July *A.D. 2024*



United States Magistrate Judge

Bail. \$ No bail arrest warrant as to each defendant

SEALED BY ORDER
OF THE COURT

FILED

JUL 11 2024

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

VERONICA JUAREZ,
HERNANDO FELIX, and
[REDACTED]

Defendants.

CASE NO.

CR-24 00392 HSG

VIOLATIONS:

21 U.S.C. §§ 846, 841(a)(1), and (b)(1)(C) –
Conspiracy to Distribute and Possess with Intent to
Distribute Methamphetamine;

21 U.S.C. § 841(a)(1) and (b)(1)(B) –Distribution of
50 grams or more of Methamphetamine (2 counts);

21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) –Possession
with Intent to Distribute 50 grams or more of
Methamphetamine;

21 U.S.C. § 841(a)(1) and (b)(1)(B)(ii) –Possession
with Intent to Distribute 500 grams or more of
Cocaine;

21 U.S.C. § 853 – Forfeiture Allegation

INDICTMENT

The Grand Jury charges:

COUNT ONE: (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C) – Conspiracy to Distribute and Possess
with Intent to Distribute Methamphetamine)

Beginning on a date unknown to the Grand Jury, but no later May 5, 2023, and continuing
through at least August 9, 2023, both dates being approximate and inclusive, in the Northern District of

INDICTMENT

1 California and elsewhere the defendants,

2 VERONICA JUAREZ, and
3 HERNANDO FELIX,

4 and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute
5 and possess with intent to distribute a mixture and substance containing a detectable amount of
6 methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in
7 violation of Title 21, United States Code, Sections 846, 841(a)(1), and (b)(1)(C).

8 COUNT TWO: (21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) – Distribution of Methamphetamine)

9 On or about June 28, 2023, in the Northern District of California, the defendant,

10 VERONICA JUAREZ,

11 did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a
12 detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II
13 controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

14 COUNT THREE: (21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) – Distribution of Methamphetamine)

15 On or about July 27, 2023, in the Northern District of California, the defendants,

16 HERNANDO FELIX, and
17 [REDACTED],

18 did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a
19 detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II
20 controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

21 COUNT FOUR: (21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) – Possession with Intent to Distribute
Methamphetamine)

22 On or about August 9, 2023, in the Northern District of California, the defendant,

23 VERONICA JUAREZ,

24 did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and
25 substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its
26 isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section
27 841(a)(1) and (b)(1)(B)(viii).

28 //

1 COUNT FIVE: (21 U.S.C. § 841(a)(1) and (b)(1)(B)(ii) – Possession with Intent to Distribute
2 Cocaine)

3 On or about November 2, 2023, in the Northern District of California, the defendant,
4 [REDACTED],
5 did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or
6 substance containing a detectable amount of cocaine, its salts, isomers, and salts of its isomers, a
7 Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and
8 (b)(1)(B)(ii).

9 FORFEITURE ALLEGATION: (21 U.S.C. § 853(a))

10 The allegations contained above are hereby re-alleged and incorporated by reference for the
11 purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

12 Upon conviction of any of the offenses alleged in Counts One through Five above, the
13 defendants

14 VERONICA JUAREZ,
15 HERNANDO FELIX, and
16 [REDACTED],

17 shall forfeit to the United States all right, title, and interest in any property constituting and derived from
18 any proceeds defendant obtained, directly or indirectly, as a result of such violations, and any property
19 used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such
20 violations, including but not limited to a forfeiture money judgment and the following:

- 21 a. \$37, 540 seized from 627 Indiana Street #B, Vallejo, CA on August 9, 2023,
- 22 b. Nonserialized semi-automatic pistol seized from 627 Indiana Street #B, Vallejo,
23 CA on August 9, 2023,
- 24 c. Nonserialized 9mm semi-automatic pistol seized from dresser at 627 Indiana
25 Street #B, Vallejo, CA on August 9, 2023,
- 26 d. all ammunition seized from 627 Indiana Street #B, Vallejo, CA on August 9,
27 2023.

28 If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 21, United States Code, Section 853, and Federal Rule of Criminal Procedure 32.2.

DATED: July 11, 2024

A TRUE BILL.


FOREPERSON
San Jose

ISMAIL J. RAMSEY
United States Attorney

/s/ Maya Karwande
Maya Karwande
Assistant United States Attorney

**SEALED BY ORDER
OF THE COURT**

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1), (b)(1)(C) – Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine; ☐ Petty
21 U.S.C. § 841(a)(1) and (b)(1)(B) – Distribution of 50 grams or more of Methamphetamine ☐ Minor
21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii) – Possession with Intent to Distribute 50 grams or more of Methamphetamine ☐ Misdemeanor
☒ Felony

PENALTY: Count 1: Max 20 years, Supervised release: Max life, Min 3 years, \$1,000,000 fine. Count 2: Max: 40 years, Min 5 years, Supervised release: max: life, min 4 years, \$5,000,000 fine. Both: forfeiture, potential deportation, denial of federal benefits, special assessment.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE

DEFENDANT - U.S.

VERONICA JUAREZ

DISTRICT COURT NUMBER

CR - 24 00392

HSG

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW
DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE
CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person
Furnishing Information on this form Ismail J. Ramsey

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.
Attorney (if assigned) Maya Karwande

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction } ☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

SEAL BY ORDER
OF THE COURT

FILED

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

21 U.S.C. §§ 846, 841(a)(1), and (b)(1)(C) - Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine
21 U.S.C. § 841(a)(1) and (b)(1)(B) - Distribution of 50 grams or more of Methamphetamine (1 count)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: Count 1: Max 20 years, Supervised release: Max life, Min 3 years, \$1,000,000 fine. Count 2: Max: 40 years, Min 5 years, Supervised release: max: life, min 4 years, \$5,000,000 fine. Both: forfeiture, potential deportation, denial of federal benefits, special assessment.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE

DEFENDANT - U.S.

HERNANDO FELIX

DISTRICT COURT NUMBER

CR - 24 00392

HSC

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW
DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE
CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Ismail J. Ramsey

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Maya Karwande

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

SEALED BY ORDER
OF THE COURT

FILED

JUL 11 2024

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

CLERK, U.S. DISTRICT COURT
OAKLAND DIVISION NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE

OFFENSE CHARGED

21 U.S.C. § 841(a)(1) and (b)(1)(B) - Distribution of 50 grams
or more of Methamphetamine
21 U.S.C. § 841(a)(1) and (b)(1)(B)(ii) - Possession with Intent
to Distribute 500 grams or more of Cocaine☐ Petty
☐ Minor
☐ Misdemeanor
☒ FelonyPENALTY: Max: 40 years, Min 5 years, Supervised release: max: life, min 4
years, \$5,000,000 fine, forfeiture, potential deportation, denial of
federal benefits, special assessment.

DEFENDANT - U.S.

DISTRICT COURT NUMBER

CR - 24 00392 HSG

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court,
give name of court☐ this person/proceeding is transferred from another district
per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of
charges previously dismissed
which were dismissed on motion
of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a
pending case involving this same
defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s)
before U.S. Magistrate regarding this
defendant were recorded under

Name and Office of Person

Furnishing Information on this form Ismail J. Ramsey

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Maya Karwande

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☐ If not detained give date any prior
summons was served on above charges2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Monterey County

IS IN CUSTODY

4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
been filed? ☐ NoIf "Yes"
give date
filedDATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments: